III. REMARKS

1. Claim 6 is amended.

2. Claims 1-20, 23-29 and 31-35 are patentable under 35 USC 103(a) over the combination of Pyotsia et al. (US 7010294, hereinafter "Pyotsia"), Reid et al. (US 6182226, hereinafter "Reid") and Kim et al. (US 6314385, hereinafter "Kim").

Claim 1 recites that the remote network receives the second data without an IP address of the predetermined semiconductor processing tool associated with the second data being known to the remote network. The Examiner asserts that modifying Pyotsia with Reid discloses this feature. The only basis for such a combination provided by the Examiner is that "[o]ne of ordinary skill in the art could have substituted WAP security of Pyotsia by known methods. For example, Pyotsia discloses security by WAP protocol and Reid discloses 'destination IP address rewrites allow an inbound connection through network address translation (NAT) address hiding to be remapped to a destination inside the NAT barrier' and the results would have been a predictable use of known technique of providing security over the network." This analysis provided by the Examiner in this office action, as well as in previous office actions, <u>completely ignores and fails to address the fact that Pyotsia expressly teaches against hiding the "address" of the field devices 14-16</u>.

In this office action and in the previous office actions the Examiner merely quotes large portions of Pyotsia (which makes the office action vague and difficult to read) and to column 6, lines 46-56 of Reid with respect to the rewrite node. The Examiner completely fails to acknowledge that Pyotsia specifically

discloses that the identity of the valves must be known to allow the user to select a valve. Thus, one skilled in the art would not look to Reid for modifying Pyotsia as suggested by the Examiner so that the "address" of the valves are hidden as this would completely undermine the teachings of Pyotsia (i.e. to allow selection of a field device through hierarchically arranged WWW pages that mimic plants, areas of respective plants and then tags for field items located in each of the areas of a respective plant, see Col. 8, L. 30-65, or to directly access a filed device by inputting the tag corresponding to that field device, see Col. 8, L. 66 – Col. 9, L. 12).

Modifying Pyotsia with Reid clearly would change the principal of operation of Pyotsia as well as render Pyotsia unsuitable for its intended purpose as hiding the "address" of the field devices (e.g. making it so that the identity of the field device is unknown to the user of the mobile terminal) would make it impossible to have the hierarchical structure of WWW pages that allows the user of the mobile terminal to identify, from the mobile terminal, which plant is to be identified, which area of the accessed plant is to be identified, and then after the plant and area of the plant are identified, which field device is to be identified.

The Examiner again notes that the rewrites in Reid can be based on users however, the Examiner's reliance on column 6, lines 54-56 of Reid is again misguided. Reid discloses a process that allows internal hosts (i.e. the users, see Fig. 2 which clearly shows the users as being part of the internal network in Reid) to be aliased to external addresses (Col. 6, L. 54-55) for preventing malicious activities on the part of both people inside and outside the organization (Col. 1, L. 16-19). Even though the

rewrites in Reid can be based on users the address of the users is still hidden to the external network and even other users of the internal network. Thus, if Reid is applied to Pyotsia as suggested by the Examiner, the identity of the different valves 14-16 (which it is assumed the Examiner is equating to the users in Reid) would be aliased to an external address where the aliasing to the external addresses would be tailored to each valve 14-16 (i.e. based on the user or valve). Basing the aliasing on a specific valve does nothing to alleviate the fact that Reid discloses the identity of the user (or valve in this case) is still hidden (i.e. aliased to an external address) thereby hiding the identity of the valves 14-16 from the user of the mobile terminal MT. As described above, hiding the identity of the valves 14-16 from the user of the mobile terminal in Pyotsia makes the use of the hierarchically arranged WWW pages for identifying the plants, the areas of the plants and the field devices (i.e. valves) within those areas an impossibility.

Contrary to the aliasing of internal hosts to external addresses and address hiding of Reid, Pyotsia specifically requires the identity of the field devices to be known in order for the user to access the field device through the hierarchically arranged WWW pages. Thus, Pyotsia directly teaches against the address hiding and rewriting of Reid. For example, Pyotsia discloses remotely controlling, configuring or monitoring field devices with a general purpose mobile terminal (Col. 3, L. 6-10). In Pyotsia the user knows exactly which field device within the plant is being accessed. For example, referring to column 8, lines 30-65 Pyotsia discloses that the WWW server 23 or 33 is arranged to assist the selection of the desired field device by providing a hierarchic set of WWW pages representing the logical, functional or location architecture of the plant in a tree

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configuration. In Pytosia the user selects a desired plant 1, 2, 3, 4 from the WWW page shown in FIG. 4A and is then directed to a new WWW page where the user selects an area of the plant as shown in FIG. 4B. After the area of the plant is selected the user is presented with another new WWW page for selecting the desired tag from a list. After the desired tag is selected the user is presented with a WWW page of the desired field device. Pyotsia specifically recites that the tag is a unique code used for identification of each field device in the plant (Col. 8, L. 59-65).

Thus, one skilled in the art would not look to the address hiding and rewrites of Reid for modifying Pyotsia because Pyotsia expressly requires the identity of the field devices to be known in order for the user to select the identity of the field device from the list provided on the WWW page (i.e. Pyotsia teaches against its combination with Reid). Therefore, claim 1 is patentable over the combination of Pyotsia and Reid.

If the Examiner is to maintain that the rejection of Applicant's claims over the combination of Pyotsia and Reid the Examiner must explicitly explain how Reid can be combined with Pyostia while still allowing the user of the mobile terminal in Reid to access a particular valve in the manner expressly recited in Pyotsia (e.g. through the hierarchically arranged WWW pages). The mere recitation of portions of the cited references coupled with a mere conclusory statement (e.g. the reference cam be combined and the results would have been a predictable use of known techniques) is wholly insufficient to support the rejection especially when the result of the combination completely undermines the teachings of the primary reference Pyotsia. The Examiner is reminded that rejections on obviousness cannot be

sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness. *KSR*, 82 USPQ2d at 1396 quoting *In re Kahn*, 441 F.3d 977, 988, 78 USPQ2d 1329, 1336 (Fed. Cir. 2006). (MPEP § 2143.01).

The Examiner acknowledges that the combination of Pyotsia and Reid (the combination of which is improper for the reasons described above) fails to disclose or suggest a local network interface permitting data transfer between a local network and an intermediate network, the local network including at least one semiconductor processing tool and semiconductor processing tool monitoring equipment, wherein the local network is configured to receive and display a suggestion, at the predetermined semiconductor processing tool, <u>from a user on the remote network</u> regarding the operation of the predetermined semiconductor processing tool being monitored on the local network. The Examiner looks to Kim as disclosing this feature.

Kim merely discloses that a maintenance module 12 of a host computer 10 <u>automatically downloads</u> a warning message to the equipment 30 and the O/I PC 40, to be displayed on a display device of, for example, the equipment 30 and the O/I PC 40. (Col. 3, L. 51-55). This automatically downloaded warning message is generated when the host computer automatically receives the first set of maintenance data from the semiconductor fabricating equipment 30 and compares the first set of maintenance data with a threshold value. If the first set of maintenance data exceeds the threshold the warning message is automatically sent to the semiconductor fabricating equipment 30. There is absolutely nothing in Kim that discloses the warning message comes "from a user on the remote network" as recited in

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Applicant's claim 1. The only user disclosed in Kim is the operator of the semiconductor fabricating equipment 30 and the O/I PC 40. Thus, Kim cannot disclose or suggest the local network is configured to receive and display a suggestion, at the predetermined semiconductor processing tool, from a user on the remote network regarding the operation of the predetermined semiconductor processing tool being monitored on the local network as recited in Applicant's claim 1.

Therefore, claim 1 is patentable over the combination of Pyotsia, Reid and Kim for the above reasons. Claims 6, 11 and 24 are patentable over the combination of Pyotsia, Reid and Kim for reasons substantially similar to those described above with respect to claim 1. Claims 2-5, 7-10, 12-23, 25-29 and 31-35 depend from claims 1, 6, 11 and 24 and are patentable at least by reason of their respective dependencies.

Further, Claim 6 also recites the conveyance (by the module) of the active and passive requests (from the user on the remote network to the to at least one of the plurality of semiconductor processing tools of the local network) depends at least partly on a status of an operation of the at least one of the plurality of semiconductor processing tools at a time of the active or passive request. This feature is simply not disclosed or suggested by the combination of Pyotsia, Reid and Kim.

3. Claim 22 is patentable under 35 USC 103(a) over Pyotsia, Reid, Kim and Crist et al. (US 6182226, hereinafter "Crist"). Claim 22 depends from claim 11. Claim 11 is patentable over the combination of Pyotsia, Reid and Kim for the reasons described above. It is therefore submitted that claim 22 is patentable over the combination of Pyotsia, Reid and Kim at least by reason of its dependency.

4. For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,

William J. Knotts, Jr.
Reg. No. 53,145

7/14/2011
Date

Perman & Green, LLP
99 Hawley Lane
Stratford, CT   06614
(203) 259-1800
Customer No.: 2512